

K&L GATES

David S. Catuogno  
Partner  
David.Catuogno@klgates.com

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T +1 973 848 4023  
F +1 973 848 4001

**VIA ECF**

Hon. John P. Mastando III  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

**Re: Kenneth P. Silverman, chapter 7 Trustee of Liberty Bridge Capital Management, GP, LLC, et al v. Kenneth J. Birnbaum Adv. Pro. No. 21-01245**

Dear Judge Mastando:

This firm represents Kenneth J. Birnbaum (the “Defendant”) in the above-referenced adversary proceeding.

On December 10, 2024, counsel to Kenneth P. Silverman, Esq., the chapter 7 trustee (the “Trustee”) for the jointly administered bankruptcy estates of Liberty Bridge Capital Management, GP, LLC, *et. al.*, filed a letter with this Court requesting relief from the meditation requirement established by the adversary procedures order entered on February 7, 2022 under Case No. 20-01190. This letter is respectfully made to the Court to join the Trustee’s request for permission for both parties to conduct discovery with the prospect of a mediation at a later date.

Should Your Honor have any questions regarding the above, please do not hesitate to have someone from chambers contact me. Thank You.

Very truly yours,

/s/ David S. Catuogno

David S. Catuogno

cc: Anthony C. Acampora, Esq. (Via ECF)  
Kenneth P. Silverman, Esq. (Via ECF)